

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

TALECRIS BIOTHERAPEUTICS, INC. and)	
BAYER HEALTHCARE LLC,)	
)	
Plaintiffs,)	C. A. No. 05-349-GMS
)	
v.)	JURY TRIAL DEMANDED
)	
BAXTER INTERNATIONAL INC. and)	
BAXTER HEALTHCARE CORPORATION,)	
)	
Defendants)	
)	
)	
<hr style="width: 30%; margin-left: 0;"/>		
BAXTER HEALTHCARE CORPORATION,)	
)	
Counterclaimant,)	
)	
v.)	
)	
TALECRIS BIOTHERAPEUTICS, INC. and)	
BAYER HEALTHCARE LLC,)	
)	
Counterdefendants.)	

NOTICE OF DEPOSITION OF BILL ZABEL

PLEASE TAKE NOTICE that, pursuant to Rule 30(b) of the Federal Rules of Civil Procedure, Defendant Baxter International Inc. and Defendant/Counterclaimant Baxter Healthcare Corporation (collectively "Baxter"), by and through their attorneys of record, will take the deposition of Bill Zabel on September 20, 2006 beginning at 9:30 a.m. at the offices of Connolly, Bove, Lodge & Hutz LLP, 1007 North Orange Street, Wilmington, Delaware 19891. The deposition will be before a notary public, or other authorized person to administer oaths, will be recorded stenographically and/or by video tape, will include the use of interactive real time

transcription (e.g., Live Notes), and will continue from day to day until completed.

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Dated: August 17, 2006

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By: /s/ Philip A. Rovner

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE
CERTIFICATE OF SERVICE

I, Philip A. Rovner, hereby certify that on August 17, 2006, the within document was filed with the Clerk of the Court using CM/ECF which will send notification of such filing(s) to the following; that the document was served on the following counsel as indicated; and that the document is available for viewing and downloading from CM/ECF.

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